

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

V.

KINGSLEY R. CHIN,
ADITYA HUMAD, and
SPINEFRONTIER, INC.,

Defendants.

Criminal No. 1:21-cr-10256-IT

DEFENDANTS' MOTION TO DISMISS COUNT EIGHT

Defendants Kingsley R. Chin, Aditya Humad, and SpineFrontier, Inc. respectfully submit this motion to dismiss Count Eight of the Indictment.

In accordance with Local R. 7.1(b)(1), defendants respectfully submit herewith a memorandum in support of this motion.

Respectfully submitted,

/s/ Joshua L. Solomon

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Certificate of Service

The undersigned certifies that this document, filed through the ECF system, will be electronically served on counsel who are registered users of ECF on January 26, 2024.

/s/ Joshua L. Solomon

Local Rule 7.1 Certification

The undersigned certifies that counsel for the defendants conferred in good faith with counsel for the government on multiple occasions by email, letters, and phone/video conferences concerning this motion, and were unable to resolve or further narrow the issues presented herein.

/s/ Joshua L. Solomon